

STATEMENT OF BASIS

as required by LAC 33:IX.3109, for draft Louisiana Pollutant Discharge Elimination System Permit No. LA0033308; AI 30500; PER20070001 to discharge to waters of the State of Louisiana as per LAC 33:IX.2311.

The permitting authority for the Louisiana Pollutant Discharge Elimination System (LPDES) is:

Louisiana Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

- I. **THE APPLICANT IS:** Town of Logansport
Logansport Municipal Wastewater Treatment Facility
P.O. Box 400
Logansport, LA 71049

- II. **PREPARED BY:** Eura DeHart

- DATE PREPARED:** June 5, 2007

- III. **PERMIT ACTION:** reissue LPDES permit LA0033308, AI 30500; PER20070001

LPDES application received: January 29, 2007

EPA has not retained enforcement authority.

LPDES permit issued: June 11, 2002
LPDES permit expires: July 1, 2007

IV. **FACILITY INFORMATION:**

- A. The application is for the discharge of treated sanitary wastewater from a publicly owned treatment facility serving the Town of Logansport.

- B. The permit application does not indicate the receipt of industrial wastewater.

- C. The facility is located 2 miles south of LA Hwy 84 and 0.25 miles east of Unca St. on a dirt road on the east end and south side of Oil St. in Logansport, DeSoto Parish.

- D. The treatment facility consists of a three-cell oxidation pond. Disinfection is by chlorination.

- E. Outfall 001

Discharge Location:	Latitude 31° 57' 46" North Longitude 93° 59' 15" West
Description:	treated sanitary wastewater
Design Capacity:	0.40 MGD
Type of Flow Measurement which the facility is currently using:	Ultrasonic Flow

V. **RECEIVING WATERS:**

The discharge is into an unnamed ditch; thence into Bayou Castor; thence into the Toledo Bend Reservoir in segment 110101 of the Sabine River Basin. This segment is listed on the 303(d) list of impaired waterbodies.

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The designated uses and degree of support for Segment 110101 of the Sabine River Basin are as indicated in the table below^{1/}:

Overall Degree of Support for Segment 110101	Degree of Support of Each Use						
	Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
Partial	Full	Full	Not Supported	N/A	N/A*	N/A	Full

^{1/}The designated uses and degree of support for Segment 110101 of the Sabine River Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2004 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

*The drinking water use applies only to the Toledo Bend Reservoir–Texas–Louisiana Line to Toledo Bend Dam. Surface waters designated as drinking water supplies are identified in the numerical criteria tables; this designation does not apply to their tributaries or distributaries unless so specified (33:IX.1111.D).

VI. ENDANGERED SPECIES:

The receiving waterbody, Subsegment 110101 of the Sabine River Basin, is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U. S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

VII. HISTORIC SITES:

The discharge is from an existing facility location, which does not include an expansion beyond the existing perimeter. Therefore, there should be no potential effect to sites or properties on or eligible to for listing on the National Register of Historic Places, and in accordance with the 'Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits' no consultation with the Louisiana State Historic Preservation Officer is required.

VIII. PUBLIC NOTICE:

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit modification and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

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Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

For additional information, contact:

Mr. Eura DeHart
 Permits Division
 Department of Environmental Quality
 Office of Environmental Services
 P. O. Box 4313
 Baton Rouge, Louisiana 70821-4313

IX.

PROPOSED PERMIT LIMITS:

Subsegment 110101, Toledo Bend Reservoir – Texas-Louisiana Line to Toledo Bend Dam, is listed on LDEQ's Final 2005 303(d) list as impaired for mercury. Although the TMDL's for the Sabine River Basin were due to be completed by March 31, 2007, a TMDL has not yet been developed for mercury for this waterbody. A TMDL will be scheduled following completion of the EPA Consent Decree TMDL schedule. A reopener clause is being placed in Part II of the permit to allow for more stringent or additional limitations or requirements to be placed in the permit, if needed, as a result of the TMDL.

Mercury

The mercury impairment listed for subsegment 110101 applies only to those waterbodies specifically identified in LDEQ's Final 2005 Integrated Report, and not to the entire subsegment unless so specified. Because the discharge from this facility is not directly into Toledo Bend Reservoir, mercury will not be addressed in permit development.

Final Effluent Limits:**OUTFALL 001**

Final limits shall become effective on the effective date of the permit and expire on the expiration date of the permit.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
BOD ₅	100	30 mg/l	45 mg/l	Limits are set in accordance with an EPA Administrative Update for the Town of Logansport dated March 17, 1986 (EDMS Document No. 30761561).
TSS	300	90 mg/l	135 mg/l	Limits are set in accordance with an EPA Administrative Update for the Town of Logansport dated March 17, 1986 (EDMS Document No. 30761561).

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Other Effluent Limitations:**1) Fecal Coliform**

The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation. According to LAC 33:IX.1113.C.5.b.i, the fecal coliform standards for this water body are 200/100 ml and 400/100 ml. Therefore, the limits of 200/100 ml (Monthly Average) and 400/100 ml (Weekly Average) are proposed as Fecal Coliform limits in the permit. These limits are being proposed through Best Professional Judgement in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities have demonstrated an ability to comply with these limitations using present available technology.

2) pH

According to LAC 33:IX.3705.A.1., POTW's must treat to at least secondary levels. Therefore, in accordance with LAC 33:IX.5905.C., the pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time.

3) Solids and Foam

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

X.**PREVIOUS PERMITS:**

LPDES Permit No. LA0033308: Issued: June 11, 2002
Expires: July 1, 2007

<u>Effluent Characteristics</u>	<u>Discharge Limitations</u>		<u>Monitoring Requirements</u>	
	<u>Daily Avg.</u>	<u>Daily Max.</u>	<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow	Report	Report	Continuous	Recorder
BOD ₅	30 mg/l	45 mg/l	2/month	Grab
Total Suspended Solids	90 mg/l	135 mg/l	2/month	Grab
Fecal Coliform Bacteria	200	400	2/month	Grab
pH			2/month	Grab

XI.**ENFORCEMENT AND SURVEILLANCE ACTIONS:****A) Inspections**

A review of the files indicates the following inspections have been performed during the period beginning May 17, 2005, and ending May 17, 2007, for this facility.

Date – January 30, 2006

Summary of Findings –

1. The wastewater treatment plant is well maintained.
2. DMR's are submitted according to permit requirements.
3. DMR's revealed satisfactory effluent results.

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Date – March 1, 2007

Summary of Findings –

1. An investigation was conducted in response to a self-reported sewage spill on Barry Road in Logansport that occurred due to deterioration of the collection line near the facility.
2. All of the sewage spill was contained and no sewage was released off-site. A trench was dug to drain the spill into the sewage treatment ponds. The spill did not enter a waterbody.
3. Superintendent Rex Clark said the line would be replaced/repared by April 2, 2007. As of May 17, 2007, the status is unknown.

B) Compliance and/or Administrative Orders

A review of the files indicates that a Compliance Order (Enforcement Tracking No. WE-C-04-0321) was issued to the Town of Logansport (Respondent) on August 25, 2004.

Summary of Compliance Order:

1. The Respondent owns and/or operates a sewage treatment facility located approximately two miles south of La. Highway 84 and 0.25 miles east of Uncas St. at 2015 Barry Rd. in Logansport, LA. The Respondent was issued LWDPs permit WP2124 on May 10, 1995, which expired on May 9, 2000. An application for a LPDES permit was received in a timely manner, and LWDPs permit WP2124 was administratively continued until LPDES permit LA0033308 was issued to the Respondent on July 1, 2002. LPDES permit LA0033308 will expire on June 30, 2007. Under the terms and conditions of LWDPs permit WP2124 and LPDES permit LA0033308, the Respondent is authorized to discharge treated sanitary wastewater from its facility into an unnamed ditch, thence into Bayou Castor, thence into the Toledo Bend Reservoir, all waters of the state.
2. Inspections conducted on or about October 29, 2001 and November 14, 2001, based on citizens' complaints received on or about October 28, 2001, and November 13, 2001, respectively, revealed that the Respondent did cause or allow the unauthorized discharge of inadequately treated sanitary wastewater. Specifically, a lift station at 908 Uncas St. caused the overflow of an unknown amount of raw sewage, which drained into a wooded area and thence into bayou Castor, waters of the state.
3. Inspections conducted on or about October 29, 2001, and November 14, 2001, and subsequent file review conducted on or about May 4, 2004, revealed that the Respondent failed to report the above-mentioned overflow to the Department, as required by its permit.
4. An investigation on or about October 30, 2001, as the result of a citizen's complaint, revealed that the Respondent did cause or allow the unauthorized discharge of inadequately treated sanitary wastewater. Specifically, the Town of Logansport Utilities Superintendent was contacted about a complaint of a sewage overflow. The Utilities Superintendent stated that a pump failure caused the overflow of an unknown amount of raw sewage at 708 Main St. into the Sabine River, waters of the state.
5. Further inspection conducted on a bout November 14, 2001, revealed that the Respondent did fail to meet permit limitations. Analysis of a sample collected from the discharge revealed a BOD₅ value of 203 mg/L.
6. AN inspection on or about December 11, 2003 revealed that the Respondent did cause or allow the unauthorized discharge of inadequately treated sanitary wastewater. Specifically, a lift station at 908 Uncas St. caused the overflow of an unknown amount of raw sewage on December 6, 2003, and December 8, 2003, into an unnamed ditch and thence into Bayou Castor, waters of the state.
7. A file review conducted on or about May 4, 2004, revealed the numerous permit excursions as reported on DMRs. Between July 2000 and November 2003, there were 5 exceedences of limits for Fecal Coliform, 7 exceedences of limits for TSS, and 1

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- exceedence of limits for pH.
8. Further file review on or about May 4, 2004, revealed that the respondent failed to submit noncompliance reports for daily maximum permit limitations excursions and all instances of noncompliance.
 9. Further file review conducted on or about May 4, 2004, revealed that the Respondent failed to submit monthly DMRs in accordance with its permit. Specifically, the Respondent failed to submit DMRs for January 200 and April 2001.
 10. The Respondent was order to immediately take any and all steps necessary to meet and maintain compliance with the permit limitations and conditions contained in LPDES permit LA0033308.

C) DMR Review

A review of discharge monitoring reports for the period beginning May 1, 2004 through February 28, 2007 has revealed the following violations:

Parameter	Outfall	Period of Excursion	Permit Limit	Reported Quantity
Fecal Coliform, Weekly Avg.	001	June 2004	400 cfu/100 ml	440 cfu/100 ml
TSS, Monthly Avg.	001	November 2004	300 lb/day	301.9 lb/day
Fecal Coliform, Monthly Avg.	001	November 2004	200 cfu/100 ml	278.9 cfu/100 ml
Fecal Coliform, Weekly Avg.	001	November 2004	400 cfu/100 ml	4860 cfu/100 ml
Fecal Coliform, Weekly Avg.	001	December 2004	400 cfu/100 ml	600 cfu/100 ml
Fecal Coliform, Weekly Avg.	001	June 2005	400 cfu/100 ml	900 cfu/100 ml
pH, Maximum	001	August 2005	9.0 s.u.	9.12 s.u.
pH, Maximum	001	September 2005	9.0 s.u.	9.19 s.u.
pH, Maximum	001	November 2005	9.0 s.u.	9.02 s.u.
Fecal Coliform, Monthly Avg.	001	March 2006	200 cfu/100 ml	530 cfu/100 ml
Fecal Coliform, Weekly Avg.	001	March 2006	400 cfu/100 ml	2925 cfu/100 ml
BOD ₅ , Monthly Avg.	001	April 2006	30 mg/l	33.8 mg/l
BOD ₅ , Weekly Avg.	001	April 2006	45 mg/l	61.5 mg/l
Fecal Coliform, Weekly Avg.	001	April 2006	400 cfu/100 ml	436 cfu/100 ml
pH, Maximum	001	June 2006	9.0 s.u.	9.10 s.u.
Fecal Coliform, Monthly Avg.	001	June 2006	200 cfu/100 ml	1026 cfu/100 ml
Fecal Coliform, Weekly Avg.	001	June 2006	400 cfu/100 ml	2800 cfu/100 ml
Fecal Coliform, Monthly Avg.	001	July 2006	200 cfu/100 ml	226 cfu/100 ml
Fecal Coliform, Weekly Avg.	001	July 2006	400 cfu/100 ml	800 cfu/100 ml
BOD ₅ , Monthly Avg.	001	February 2007	100 lb/day	109.1 lb/day
Fecal Coliform, Monthly Avg.	001	February 2007	200 cfu/100 ml	2400 cfu/100 ml
Fecal Coliform, Weekly Avg.	001	February 2007	400 cfu/100 ml	2400 cfu/100 ml

XII.**ADDITIONAL INFORMATION:**

The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional water quality studies and/or TMDL's. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDL's for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as requested by the permittee and/or as necessary to achieve compliance with water quality standards. Therefore, prior to upgrading or expanding this facility, the permittee should contact the Department to determine the status of the work being done to establish future effluent limitations and additional permit conditions.

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The nearest drinking water intake, Logansport Water System, is located approximated 3.5 miles downstream from the discharge point.

Final effluent loadings (i.e. lbs/day) have been established based upon the permit limit concentrations and the design capacity of 0.40 MGD.

Effluent loadings are calculated using the following example:

$$\text{BOD: } 8.34 \text{ gal/lb} \times 0.40 \text{ MGD} \times 30 \text{ mg/l} = 100 \text{ lb/day}$$

At present, the Monitoring Requirements, Sample Types, and Frequency of Sampling as shown in the permit are standard for facilities of flows between 0.10 and 0.50 MGD.

Effluent Characteristics

Flow
BOD₅
Total Suspended Solids
Fecal Coliform Bacteria
pH

Monitoring Requirements

<u>Measurement</u>	<u>Sample Type</u>
Frequency	
Continuous	Recorder
2/month	Grab
2/month	Grab
2/month	Grab
2/month	Grab

Pretreatment Requirements

Based upon consultation with LDEQ pretreatment personnel, general pretreatment language will be used due to the lack of either an approved or required pretreatment program.

Pollution Prevention Requirements

The permittee shall institute or continue programs directed towards pollution prevention. The permittee shall institute or continue programs to improve the operating efficiency and extend the useful life of the facility. The permittee will complete an annual Environmental Audit Report **each year** for the life of this permit according to the schedule below. The permittee will accomplish this requirement by completing the Environmental Audit Form which has been attached to the permit. All other requirements of the Municipal Wastewater Pollution Prevention Program are contained in Part II of the permit.

The audit evaluation period is as follows:

Audit period Begins	Audit Period Ends	Audit Report Completion Date
Effective Date of Permit	12 Months from Audit Period Beginning Date	3 Months from Audit Period Ending Date

XIII

TENTATIVE DETERMINATION:

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a new permit for the discharge described in this Statement of Basis.

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REFERENCES:

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 8, "Wasteload Allocations / Total Maximum Daily Loads and Effluent Limitations Policy," Louisiana Department of Environmental Quality, 2005.

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 5, "Water Quality Inventory Section 305(b) Report," Louisiana Department of Environmental Quality, 1998.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards," Louisiana Department of Environmental Quality, 2004.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Subpart 2 - "The LPDES Program," Louisiana Department of Environmental Quality, 2004.

Low-Flow Characteristics of Louisiana Streams, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

Index to Surface Water Data in Louisiana, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

LPDES Permit Application to Discharge Wastewater, Town of Logansport, Logansport Municipal Wastewater Treatment Facility, January 29, 2007.